

Annual 47 C.F.R. § 64.2009(e) CPNI Certification
EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2011 covering the prior calendar year 2011

1. Date filed: 2/6/2012
2. Name of company(s) covered by this certification: iNetworks Group, Inc.
3. Form 499 Filer ID: 823740
4. Name of signatory: Raymond L. Cowley
5. Title of signatory: Senior Vice President & General Manager
6. Certification:

I, Raymond L. Cowley, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 *et seq.*

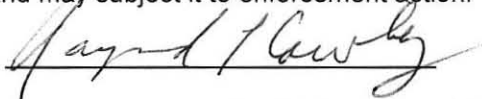
Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken actions (*i.e.*, proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed



Attachments: Accompanying Statement explaining CPNI procedures

Statement Accompanying CPNI Certification

iNetworks Group, Inc. ("iNetworks") hereby explains how its procedures comply with the requirements set forth in Section 64.2001 *et seq.* of the FCC's Rules.

iNetworks provides two types of services to its customers. First, iNetworks is a Virtual Network Provider providing resold private line data circuits to its customers, having purchased those circuits from telecommunications carriers, such as Verizon, on a wholesale basis. iNetworks has no information about the data transmitted on the circuits it supplies. Accordingly, in connection with this service iNetworks does not collect and thus does not possess any of the information defined as Customer Proprietary Network Information ("CPNI") in Section 222(f) of the Communications Act beyond the points connected by the data circuits iNetworks resells.

Second, iNetworks offers a different type of service, which does involve some exposure to CPNI, and has taken the appropriate measures to protect that CPNI from unlawful disclosure. iNetworks provides PRI service and analog business lines to several business customers in diverse geographical areas.

iNetworks receives invoices from its suppliers. Those invoices sometimes contain individually attributable call detail and other information constituting CPNI, which iNetworks passes along to its Customers.

iNetworks has instituted policies designed to protect the confidentiality of that CPNI. All members of the iNetworks staff who may be exposed to the CPNI in the invoices have been instructed that CPNI is confidential and is not to be shared with anyone outside iNetworks, except the Customer in the normal course of business. On an annual basis, all appropriate employees are provided documentation and training relative to protecting CPNI information

iNetworks employees have been warned that inappropriate disclosure of CPNI can subject iNetworks to legal penalties that may include substantial monetary fines. Employees involved in any misuse or inappropriate disclosure of this information would be subject to disciplinary action, including termination from employment. Supervisors or employees aware of any such misuse or inappropriate disclosure of CPNI must report that knowledge to iNetworks Senior Vice President and General Manager.

The CPNI referred to above is not used for any type of marketing. It is not to be disclosed by telephone to anyone, because iNetworks does not have a "carrier-customer" relationship with any of the persons to whom the CPNI belongs. Thus, iNetworks has no need of a password protection or other policy for verifying customer inquiries. Similarly, iNetworks policy does not include provisions for regulating access to CPNI in person at retail outlets because iNetworks has no retail outlets within the meaning of the CPNI rules.

iNetworks also maintains other information necessary to bill its own customers on a monthly, flat rate basis. Such billing information is maintained in password-protected shared drive computer programs. Only employees with a need to do so are granted access to billing information. Finally, iNetworks instructs all its employees on the need to maintain the confidentiality of all corporate information, including billing information.